

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

D.T.E. 99-118

ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Fitchburg Gas & Electric Light Company or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.

2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.

3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.

4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.

5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.

8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.

9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.

10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.

11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.

12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the

reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.

14. Each request for information includes a request for all documentation which supports the response provided.

15. Provide four copies of each response.

16. The term "Company" refers to Fitchburg Gas & Electric Light Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.

17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

AG-1-1 Please provide a copy of each exhibit to be presented by the Company or any of its witnesses as it is prepared.

AG-1-2 Please provide the following for Unitil and the Company for the years 1993 through 2001 as they become available:

- (1) the 10-Ks;
- (2) the 8-Ks;
- (3) the Annual Reports to shareholders and bondholders;
- (4) the U5s;

- (5) the U-13-60s;
- (6) the Proxy statements;
- (7) the FERC Forms;
- (8) the Annual Returns to the DPU/DTE;
- (9) any auditor's reports;
- (10) the five-year or ten-year financial and statistical summaries; and
- (11) the consolidating statements.

AG-1-3 Please provide for the 10-Qs and quarterly reports to bondholders and shareholders for Unitil and the Company for the years 2000 through 2001 as they become available.

AG-1-4 Please provide the prospectus distributed in anticipation of the most recent sale of any equity or debt by the Company or Unitil.

AG-1-5 Please provide a list or index, or any document which contains a list or index of the Company's periodic reports (i.e. monthly, quarterly) used internally.

AG-1-6 Please provide the following information for the Company for each month of the years 1999 through the present:

- (1) the budgeted and actual monthly income statements;
- (2) a Statement of Cash Flows; and
- (3) the short-term debt balance, short-term interest expense and rate as well as a comparison of the short-term interest rate to the contemporaneous prime rate.

AG-1-7 Please provide the following information for the years 1998 through 2000:

- (1) capitalization table for each of the affiliates of the Company showing the outstanding balances of capital, the capital ratios, and the costs of capital; and
- (2) the annual balance sheets and income statements for each of the affiliates of the Company.

AG-1-8 Please provide a copy of any and all management, organizational, construction, and performance audits of any kind of the Company and any of its affiliates performed by company personnel, contractors, consultants, any regulatory body, or any organization or individual whatsoever during the last five years.

AG-1-9 Please provide copies of all speeches made by Unitil to its shareholders from January 1, 1998 to the present.

AG-1-10 Please provide all statements and materials supplied by Unitil and the Company to financial analysts, securities analysts, rating agencies and utility groups from January 1, 1998 to the present.

AG-1-11 Please provide all publications, rating announcements, etc., concerning the Company and its affiliates by Moody's, Standard & Poor's, Argus and other similar entities from January 1, 1998 through the present.

AG-1-12 Please provide the earned return on average common equity for the twelve-month periods ending 12/31/97, 6/30/98, 12/31/98, 6/30/99, 12/31/99, 6/30/2000 and 12/31/2000 for the Company's electric division and each of its affiliates.

AG-1-13 Please provide the following information for the Company:

- (1) the most recent five-year sales volume forecasts for each of its customer classes;

- (2) the most recent five-year financial forecast; and
- (3) the most recent projected financings for the next five years.

AG-1-14 Please provide the following information for the Company for each of the quarters of 1998 through 2000:

- (1) the average book value per share of common stock for the quarter;
- (2) the book value per share of the common stock at the end of the quarter; and
- (3) the pre-tax interest coverage ratios for the previous twelve months.

AG-1-15 Please provide Unitil's market-to-book ratio for each of the months of 1998 through 2000.

AG-1-16 Please provide the debt and equity rating history for the years 1998 through 2000 for the Company and its affiliates.

AG-1-17 Please provide the following items for the Company for each of the most recent five years:

- (1) the plant in service by account and the additions, retirements, transfers, and adjustments to each of those accounts;
- (2) the year-end construction work in progress balances; and
- (3) the land and rights-of-way by account.

AG-1-18 Please provide a five-year forecast of the Company's construction budget by account.

AG-1-19 Please provide capital authorization and closing reports for all projects begun or finished during the test year of \$10,000 or more in magnitude.

AG-1-20 Please provide a breakdown of all properties sold or transferred from the Company's books since January 1983. For each transaction, please provide a schedule

indicating the date the property was sold or transferred, the sales price, the book value at the time of sale, the gain or loss recorded on the Company's books, whether the property sold was included in a rate case filing, and whether the sale or transfer was made to an affiliated company. For each property sold or transferred to an affiliated company, please provide the fair market value at the time of the sale or transfer and provide the workpapers in support of the calculation of the fair market value.

AG-1-21 Please itemize and quantify the Company's year-end 1999 and year-end 2000 balance of Intangible Plant and Capitalized Lease. Please also provide an itemization and quantification of the annual costs associated with each.

AG-1-22 Please itemize and quantify all year 1999 and year 2000 costs allocated or assigned to Plant Held For Future Use and Non-Utility Plant.

AG-1-23 Please itemize and quantify all year 1999 and year 2000 costs allocated or assigned to Construction Work In Progress.

AG-1-24 Please provide the year 1999 and year 2000 depreciation accrual rates and depreciation expense by plant account.

AG-1-25 Please itemize and quantify all depreciation, income tax, property tax, equity return, or interest costs included in the Company's Operations and Maintenance Expense Accounts.

AG-1-26 Please provide all written contracts between the Company and its affiliates. Provide a narrative description of any unwritten contracts between the Company and any affiliate, including all material terms.

AG-1-27 Please itemize all expenses from the Company allocated to any of the Company's affiliates. In your response, please include the expense account description,

account number, allocation formula, all workpapers, calculations, assumptions and basis for assumptions for each expense allocated.

AG-1-28 Please itemize all expenses allocated or assigned to the Company from each of its affiliates. In your response, please include the expense account description, account number, allocation formula, all workpapers, calculations, assumptions and basis for assumptions for each expense allocated.

AG-1-29 Please itemize all rent revenue and all rent expense items incurred during the test year that were greater than \$5,000.

AG-1-30 Please provide the total revenues received from the rental of appliances. Please describe the types of appliances rented and whether the Company is treating such revenues above or below the line. In addition, describe the method of allocating expenses to the appliance rental program.

AG-1-31 Please itemize and quantify all extraordinary income booked by the Company during the years 1999 and 2000.

AG-1-32 Please describe the types of new service offerings being developed by the Company. In responding to this question, please provide a detailed description of the new service being developed or being considered by the Company for future development. New services can be defined as any new product or service which will be provided by the Company and will be available to consumers for a fee or be made available to the public free of charge (e.g. equipment sales, rentals, or service; conservation and load management services; energy audits or advice).

AG-1-33 Please provide a breakdown of the year 1999 and year 2000 Miscellaneous Revenues by source. Please also provide the amount of expenses by account associated with generating these miscellaneous revenues.

AG-1-34 Please provide a chart of accounts for the Company for the twelve month periods ended 12/31/99, 6/30/2000 and 12/31/2000. Please include subaccounts, titles to the subaccounts, and balances of the subaccounts.

AG-1-35 Please itemize and quantify all Unitil and Company employee bonuses and incentive compensation plan payments incurred during the years 1999 and 2000.

AG-1-36 Please itemize and quantify for each Unitil and Company management employee and officer the compensation and benefits including bonuses paid to each management employee and officer during the years 1999 and 2000.

AG-1-37 Please explain the corporate policy on Unitil and Company employee and officer use of Company vehicles, noting the make, model, year, and original cost or annual lease expense of the Company vehicle used by each officer. Please also indicate whether any directors, officers or other employees of the Company have Company supplied chauffeurs and the test year costs of those chauffeurs.

AG-1-38 Please provide for each Unitil and Company officer and director of the corporation a complete copy of the record of expenses for which each was reimbursed by the Company since January 1, 1998. Please also provide a complete accounting of the services and goods (air travel, hotel accommodations, meals, etc.) that the Company provided directly to each such officer or director including an indication of the amount of each of those reimbursed expenses that was included in the year 1999 and year 2000 the Company's operations and maintenance expenses.

AG-1-39 Please provide the following for the years 1999 and 2000 for each employee, officer, director, shareholder or investor of the Company applicable:

(1) the amount(s) of all loans or forgiveness of debts provided by the Company to such individual;

(2) the type(s) and cost(s) of all services provided by the Company to such individual;
and

(3) the type(s) and cost(s) of all products provided by the Company to such individual.

AG-1-40 Please provide both the dollar amount and percent capitalized of the wages and salaries and of each of the employee benefits for the each of the last five years.

AG-1-41 Please provide a ten-year history of wage and salary increases for each of the employee groups (e.g. union, clerical, management).

AG-1-42 Please provide a copy of all employee wage contracts in effect during the years 1999 and 2000 and those signed since the year 2000.

AG-1-43 Please provide a timing schedule of the wage and salary increases for each employee group in each of the last five years (e.g. union, clerical, management).

AG-1-44 Please provide the number of Unitil and Company employees at the end of each month for the years 1998 through 2001 by employee group (e.g. union, clerical, management).

AG-1-45 Please provide the total amount of deferred salaries and wages incurred during years 1999 and 2000 as well as the total salaries and wages for each of those periods.

AG-1-46 Please provide the annual percentage of overtime hours worked compared to total hours worked for each of the last five calendar years. Please also provide the total expense associated with overtime wages and salaries incurred during the years 1999 and 2000.

AG-1-47 Please indicate whether the Company incurred any labor disruption costs during the years 1999 and 2000, and, if so, please provide for each such disruption:

- (1) the date the disruption commenced;
- (2) the date the disruption concluded;
- (3) the nature of operations affected;
- (4) the estimated cost of the disruption;
- (5) the basis for calculating the estimated cost of disruption; and

(6) the accounting treatment given the costs of each disruption.

AG-1-48 Please provide the latest actuarial reports used to determine the Company's pension cost and post retirement benefits other than pensions cost.

AG-1-49 Please provide the following information regarding the Company's pension plan and post retirement benefits other than pensions plan (separately):

(1) the amount of expense included in the year 1999 and the year 2000 operations and maintenance expenses as well as the basis for those amounts;

(2) the amount of cash contribution to the trust fund made during each of the last five years;

(3) the 1999 and 2000 year-end amounts of total accumulated pension benefit obligation (vested and non-vested);

(4) the 1999 and 2000 year-end amount of total projected benefit obligation (vested and non-vested); and

(5) the market value of the 1999 and 2000 year-end trust fund assets.

AG-1-50 Please provide a breakdown of the year-end 1999 and 2000 expenses, for all non-pension benefits available to employees. For each benefit, include a detailed description of the benefit and the conditions that each employee must meet to be entitled to the benefit.

AG-1-51 Please provide the average health care cost per employee incurred by the Company during the year 1999 and 2000. Please also provide the copies of the bills paid for the Company's health care for the last two years.

AG-1-52 Please provide a complete and detailed description of the methods that the Company is using to reduce its health care costs. Please include (but do not limit the description to) (1) the Company's provision of incentives for employees to use the least cost insurer and (2) the Company's efforts to increase employees monetary contribution to health care costs.

AG-1-53 Please provide an itemized list of all vehicles leased or purchased by the Company. For each vehicle, please provide the make, model, year, and rental charge or original book value.

AG-1-54 Please provide an itemized list of all aircraft and watercraft leased or purchased by the Company. For each aircraft and watercraft, please provide the make, model, year, rental charge and original book value.

AG-1-55 Please provide an itemized list of all food, beverage, entertainment, and travel costs included in operations and maintenance expenses in the years 1999 and 2000 of \$500 or more. Please also provide for each item, the date, location, number of employees attending, number of non-employees attending, and the nature of the event.

AG-1-56 Please provide an itemized list of all membership fees expensed by the Company. Please provide for each membership the name and nature of the organization, and the expense amount incurred in the year 1999 and 2000.

AG-1-57 Please itemize and quantify the year 1999 and year 2000 costs included in Account 922 -- Administrative Expenses Transferred.

AG-1-58 Please itemize and quantify all conservation and land management costs incurred by the Company during the test year. Please also provide a complete accounting of year 1999 and year 2000 costs including an indication of the amounts of each activity's costs that are included in operations and maintenance expenses.

AG-1-59 Please itemize and quantify all environmental cleanup costs incurred by the Company during each of the years 1999 and 2000. Please also provide a complete

accounting of each year's costs including an indication of the amounts of each activity's costs that are included in the Company's operations and maintenance expenses.

AG-1-60 Please provide the amount of storm damage costs incurred in each of the years 1999 and 2000 and:

- (1) the amount booked in the year (by account);
- (2) the amount included in operations and maintenance expense;
- (3) the amount of overtime included operations and maintenance accounts; and
- (4) the amount incurred for outside services.

AG-1-61 Please provide the following information regarding the Company's insurance policies:

- (1) a breakdown of the insurance expenses recorded in each of the years 1999 and 2000 and, for each insurance expense, please provide a detailed explanation for any differences between the expense amounts included in the year and the insurance premiums paid during that year;
- (2) the invoices for the insurance premiums paid in each of the years 1999 and 2000 and, if the Company only pays a portion of the insurance expense, please provide a summary of each insurance invoice showing the total expense and the Company's allocated portion of the expense;
- (3) if any insurance expense (including premiums) recorded in each of the years 1999 and 2000 have been allocated or assigned to the Company from any affiliate, please indicate the amount allocated or assigned and the method of assignment and provide copies of all policies for which expenses are allocated or assigned; and
- (4) an itemization and quantification of any insurance proceeds (e.g. reimbursements, recoveries, refunds, distributions, adjustments) received by the Company during or since the year 1999, along with a complete and detailed description of the accounting treatment given those proceeds.

AG-1-62 Please provide a copy of any insurance policies and the annual expense amount relating to "key man" insurance where the Company or its affiliate is a beneficiary.

AG-1-63 Please provide a complete and detailed description of each self-insurance procedure that the Company has in effect. For each, please provide (but do not limit the response to) the following information:

- (1) a description of the nature of the risks being insured;
- (2) a year 1999 and year 2000 accounting of the self-insurance plan costs including the year beginning and ending reserve balance and an itemization of the debits and the credits to the reserve during the year as well as a five-year history of the debits and credits to that reserve; and
- (3) a complete and detailed description of the methodology used to determine the annual year insurance expense including all calculation, formulas, assumptions, and workpapers.

AG-1-64 Please provide copies of invoices for all lease-type expenses paid during each of the years 1999 and 2000. (If the Company only pays a portion of the total lease expense, please provide a summary of each lease invoice showing the total lease expense and the Company's allocated portion of the expense.) Please also indicate when each lease expires.

AG-1-65 Please provide a detailed breakdown of the Company's 1999 and 2000 year-end balances of miscellaneous deferred debits. Please also indicate the amounts and the accounts that were charged when the deferred debits were credited during those years.

AG-1-66 Please set forth the accounting information concerning all out-of-period book adjustments made to book entries for the calendar years 1998, 1999, and 2000.

AG-1-67 Please provide a detailed breakdown of the Company's 1999 and 2000 year-end balances of other deferred credits. Please also indicate the amounts and the accounts that were charged when the deferred credits were debited during those years.

AG-1-68 Please itemize and quantify the costs of Unitil's and the Company's Outside Services Employed during each of the years 1999 and 2000.

AG-1-69 Please provide for each of the last three years, the gross write-offs and recoveries for each customer class.

AG-1-70 Please identify all uncollectible write-offs amounting individually to \$1000 or more for each of the years 1998, 1999, and 2000.

AG-1-71 Please provide a detailed description of the Company's accounting policy governing the write-off of accounts receivable during the last three years.

AG-1-72 Please provide a detailed description of the Company's method of accounting for unbilled revenues. Please also provide a complete and detailed description of the formula used to determine the amount of year end unbilled revenue.

AG-1-73 Please itemize by account and amount all advertising and media-related costs included in operations and maintenance expense. Please also include a copy of each and every advertisement and the cost of each.

AG-1-74 Please itemize the amounts of donations made to charitable organizations during each of the years 1999 and 2000.

AG-1-75 Please itemize the amounts of lobbying expenses included in operations and maintenance expense for each of the years 1999 and 2000. For purposes of this request, use the Department's broad definition of lobbying activities (including broad support of legislative activities) (see, e.g., D.P.U. 1720, p. 75; D.P.U. 86-33-G, p. 101).

AG-1-76 Please itemize and quantify the costs associated with any shareholder services or dividend reinvestment programs expensed during each of the years 1999 and 2000.

AG-1-77 Please indicate the year 1999 and the year 2000 amounts paid to the American Gas Association, EEL, and EPRI by the Company or paid by an affiliate and allocated to the Company. Please also breakdown the expense into membership dues and other items, identifying each area of expense.

AG-1-78 Please provide the expenses for each of the years 1999 and 2000 relating to corporate identification. Please itemize all expenses relating to any Unitil and Company name changes, logo changes, notices of new service centers, and any expense relating to Unitil's and the Company's name being printed on "give-a-way" items, such as mugs, shirts, etc..

AG-1-79 Please provide in list form the details of all judgments and/or settlements resulting from suits brought which involved Unitil and/or the Company as a defendant, which resulted in Unitil and/or the Company, in each of the years 1999 and 2000, paying or agreeing to pay or being ordered to pay an amount in excess of \$1,000, including but not limited to the case name, the date filed, the date of settlement or the date of judgment and the amount Unitil and/or the Company was ordered or agreed to pay. Provide this information even if appeals are pending and note every instance of an appeal.

AG-1-80 Please provide in list form the details of all warranty claims the Company has pending including but not limited to the amount being sought, the manufacturer, the date the claim was submitted, the specific item(s) under warranty and a copy of all communications between the Company and/or its legal counsel and the manufacturer and/or the insurer.

AG-1-81 Please provide in list form the details of all legal suits presently pending in which Unitil and/or the Company is a defendant including but not limited to the case name, the date of the filing of the case, the amount of relief sought, and the nature of the case.

AG-1-82 Please provide in list form the details of all legal suits presently pending which have been filed by Unitil and/or the Company and/or which involve Unitil and/or the Company.

AG-1-83 Please provide in list form all fines and/or penalties paid or agreed to be paid in whole or in part by Unitil and/or the Company in each of the years 1999 and 2000 including the nature of each such fine or penalty, the date assessed, and the entity

assessing Unitil and/or the Company. Provide this information even if appeals are pending and note every instance of an appeal.

AG-1-84 Please provide by community, the Company's property taxes paid in each of the calendar years 1999 and 2000, assessed valuation, and property tax rate.

AG-1-85 Please provide the amount of tax abatements received by year for the last five years. Please also provide the journal entries that were used to record each abatement.

AG-1-86 Please set forth the total dollar amount of property tax abatements which would result should all of the Company's presently pending abatement requests be granted (Note: If an exact total cannot be supplied provide the Company's best estimate).

AG-1-87 Please provide IRS and State Income Tax Forms for Unitil and/or the Company and its affiliates for the years 1998, 1999, and 2000. If the 2000 tax form is not prepared please provide the current best estimate of the Schedule M numbers for 2000.

AG-1-88 Please indicate whether the Company uses normalization accounting for all book/tax timing differences.

AG-1-89 Please provide copies of all responses to Information Requests provided by the Company in this proceeding.

Dated: January 16, 2001